

View Submitter Details

Submitter No.	S231
Submitter Name	Te Marama Ltd
Online submitter	Yes
Raw submission lodged	Yes

Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

Raw sub point number	Provision	Support/oppose	Decision sought	Reasons
S231.1	Method M44: Supporting the health of rural waterbodies.	Support	We ask GWRC to prioritise this work prior to implementing new rules.	<p>We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses.</p> <p>We are also pleased to see the farm-scale approach promoted here and ask that it is better integrated into PC1's sediment and erosion control policies and rules.</p>
S231.2	Method M44: Supporting the health of rural waterbodies.	Amend	Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.	The lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which we believe are not fit for purpose. The lack of data also makes it difficult for us to see where the water quality is and therefore what solutions to implement on farm.
S231.3	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Amend	Add "Incorporate e-coli reduction in catchment context and farm plans, based on monitored data" – to allow a farm-scale approach as per nitrogen and sediment.	<p>Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Work to reduce E-coli levels should only target areas where e-coli is shown to be an issue. There is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. It is inappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu, given the differences in catchments/sub-catchment.</p> <p>Local water quality studies need to be carried out and the option for landowner farm-scale monitoring provided for – including feedback loops to monitor the impact of actions.</p>
S231.4	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	<p>Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping in PC1.</p> <p>Refocus this section on identifying "sediment sources" rather than erosion risk land/pasture.</p>	<p>The PC1 mapping does not correspond well with ground-truthed information on erosion from landowners who have worked with the land for multiple generations. Concerned about both the accuracy of the modelled scenarios and that it might not include accurate analysis of soil types. The modelling is coarse and is not fit for purpose in Mākara/Ohariu.</p> <p>This policy includes generic assumptions on the source of sediment. Concerned that the policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events – anecdotally a much higher contributor to sediment loss. We do support revegetation of vulnerable areas of farms in order to reduce flood flows and streambank erosion – but there are multiple options for revegetation sites that best work within the farm system.</p> <p>The area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.</p> <p>Allow for a much more accurate assessment of risk on individual farms by assessment of sediment sources at the farm-scale.</p>
S231.5	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Refocus from "erosion risk" to "sediment management".	As per above, the sources of sediment are likely broader than erosion on hillsides. This will help also acknowledge other existing sediment management techniques such as low stocking rates and good pasture cover.
S231.6	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Oppose	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.	<p>This provision will financially cripple many farms given the large area, timeframes and requirement to retire the land. The removal of vegetation from this landscape occurred many generations ago yet the revegetation is required to be implemented by current owners within a short timeframe.</p> <p>The "woody vegetation" will likely need to be natural reversion since using poplars and willows (alongside grazing) is unlikely to be successful on these steepest areas given the high-wind nature of our landscape - and based on people's own trial work to date. Therefore fencing and retirement will be the only tool available.</p> <p>This area has unique challenges with revegetation projects, in large part due to the high winds. Native planting will not be affordable on this scale and natural reversion in the top of this landscape will take a very long time to establish, including a significant period through gorse, creating a seed source within farms. The provision's requirement to "maintain" the woody vegetation will be unviable, given the large-scale land retirement and reduced farm income from less productive land and high fencing costs incurred. Another challenge to revegetation projects is working alongside Meridian's wind farms (crossing six of our farms) where afforestation needs to be designed to not impede wind flow.</p> <p>The policy relies on modelling that we believe is inaccurate. It makes no sense to retire farmland where there is no actual erosion issue.</p>
S231.7	Policy WH.P26: Managing livestock access to small rivers.	Amend	<p>Replace "restrict" with "reduce through non-regulatory means".</p> <p>Amend the policy wording to match the heading about river size.</p>	<p>Make consistent with the associated Rule regarding reduced access where practical rather than restricted access.</p> <p>While we support revegetating streams in theory the sheer number of small streams on our extremely hilly landscape, the crippling costs and the complete impracticality of fencing large swathes of land, particularly when we have numerous intersecting gullies that are flood zones, we cannot support this blanket rule.</p> <p>Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. There is a risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds.</p>
S231.8	Policy WH.P27: Promoting stream shading.	Support	Amend to "where economically practical to do so"	We recognise the value of riparian planting of natives and poplar/willows for shade where practical. Terawhiti has already been actively planting poplars to help streambank stabilisation. Despite the time and costs involved to date, these actions have not been 100% successful due to the climate and wind conditions on the property.
S231.9	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	Amend	Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans	We do not want to double up on farm plan work when an existing process is already in play under national regulation.
S231.10	Rule WH.R28: Livestock access to a small river – permitted activity.	Oppose	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26.

S231.11	Rule WH.R29: Livestock access to a small river – discretionary activity.	Oppose	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26.
---------	--	--------	---	---

Raw submission documents

These are files that were uploaded as part of an online submission.

Document name 	File	Description	Upload date
Te Marama Ltd	pc1submissiontemaramaltd.pdf		15/12/2023 16:10